

Brandon S. Erlacher
Elkhart Truth Publishing Company
421 South Second Street
Elkhart, IN 46516

Re: Registered Operation Status,
039-11783-00269

Dear Mr. Erlacher:

The application from Elkhart Truth Publishing Company, received on January 19, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following printing line which prints daily newspapers, to be located at 421 South Second Street, Elkhart, Indiana 46516 is classified as registered:

- (a) One (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, with a maximum line speed of 1600 feet per minute and a maximum printing width of fifty-four (54) inches;
- (b) One (1) natural gas-fired boiler identified as B1, with a maximum heat input rate of 4.6 million (MM) British thermal units (Btu) per hour;
- (c) Two (2) natural gas-fired boilers identified as B2 and B3, each with a maximum heat input rate of 0.9 MMBtu per hour;
- (d) Image processing and transfer facilities; and
- (e) Equipment cleaning solvents and washes.

The following conditions shall be applicable:

Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of this source must annually submit an emission statement for this source because the source is located in Elkhart county and has the potential to emit more than ten (10) tons per year of VOC. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of

15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 4.6 MMBtu/hr natural gas fired boiler (identified as B1), constructed on August 4, 1964 is subject to a default particulate matter emission limit of 0.8 pounds per million (MM) Btu of heat input. The source will comply with this limit through the use of natural gas fuel.

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating), the two (2) 0.9 MMBtu/hr natural gas fired boilers (identified as B2 and B3), constructed on March 1, 1973 are subject to a default particulate matter emission limit of 0.6 pounds per million (MM) Btu of heat input. The source will comply with this limit through the use of natural gas fuel.

This registration supersedes any previous air approvals issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NH/EVP

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Rick Reynolds
Northern Regional Office
Permit Tracking - Janet Mobley
Air Programs Section- Michelle Boner

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Elkhart Truth Publishing Company
Address:	421 South Second Street, Elkhart, IN 46516
City:	Elkhart
Authorized individual:	Brandon S. Erlacher
Phone #:	(219) 294-1661
Registration #:	039-11783-00269

I hereby certify that Elkhart Truth Publishing Company is still in operation and is in compliance with the requirements of Registration 039-11783-00269.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Elkhart Truth Publishing Company
Source Location: 421 South Second Street, Elkhart, IN 46516
County: Elkhart
SIC Code: 2711
Operation Permit No.: R039-11783-00269
Permit Reviewer: Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed a renewal application from Elkhart Truth Publishing Company relating to the operation of a printing line which prints daily newspapers.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, with a maximum line speed of 1600 feet per minute and a maximum printing width of fifty-four (54) inches;
- (b) One (1) natural gas-fired boiler identified as B1, with a maximum heat input rate of 4.6 million (MM) British thermal units (Btu) per hour;
- (c) Two (2) natural gas-fired boilers identified as B2 and B3, each with a maximum heat input rate of 0.9 MMBtu per hour;
- (d) Image processing and transfer facilities; and
- (e) Equipment cleaning solvents and washes.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 039-4017-00269, issued on January 9, 1995.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on January 19, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4.)

Potential To Emit of Entire Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.05
PM-10	0.21
SO ₂	0.02
VOC	10.85
CO	2.35
NO _x	2.80

HAP's	Potential To Emit (tons/year)
Xylene	0.25
Cumene	0.20
Napthalene	0.05
TOTAL	0.50

- (a) Potential emissions (as defined in the Indiana Rule) of VOC are less than 25 tons per year, but greater than 5 tons per year. Therefore, pursuant to 326 IAC 2-5-5, a registration is required.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Emissions (ton/yr)
PM	0.05
PM10	0.21
SO ₂	0.02
VOC	10.85
CO	2.35
NO _x	2.80

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Registration R039-11783-00269, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

- (a) The three (3) natural gas fired boilers identified as B1, B2 and B3, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because the three (3) boilers were constructed prior to June 9, 1989.

- (b) The one (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because the five (5) printing presses are not publication rotogravure printing presses.
- (c) The one (1) printing line identified as Harris N-1650, consisting of five (5) Web offset printing presses identified as Unit 1 through Unit 5, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK because the five (5) printing presses are not publication rotogravure, packaging rotogravure or wide-web flexographic printing presses.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart county and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The one (1) 4.6 MMBtu/hr natural gas fired boiler (identified as B1) was constructed on August 4, 1964 and pursuant to 326 IAC 6-2-3(d), is subject to a default particulate matter emission limit of 0.8 pounds per million (MM) Btu of heat input. The source will comply with this limit through the use of natural gas fuel.
- (b) The two (2) 0.9 MMBtu/hr natural gas fired boilers (identified as B2 and B3) were constructed on March 1, 1973 and pursuant to 326 IAC 6-2-3(e), are subject to a default particulate matter emission limit of 0.6 pounds per million (MM) Btu of heat input. The source will comply with this limit through the use of natural gas fuel.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The printing presses are not subject to the requirements of 326 IAC 8-1-6 because the presses were constructed and operated prior to January 1, 1980 and have a total potential to emit VOC of less than 25 tons per year.

326 IAC 8-5-5 (Graphic Arts Operations)

The printing line (identified as Harris N-1650) is not subject to the requirements of 326 IAC 8-5-5, because the five (5) printing presses do not involve packaging rotogravure, publication rotogravure or flexographic printing.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 3.)

Conclusion

The operation of this printing line shall be subject to the conditions of the attached proposed **R039-11783-00269**.

Appendix A: Emission Calculations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
CP: 039-11783
Plt ID: 039-00269
Reviewer: Nishat Hydari / EVP

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Printing Press	TOTAL
PM	0.05	0.00	0.05
PM10	0.21	0.00	0.21
SO2	0.02	0.00	0.02
NOx	2.80	0.00	2.80
VOC	0.15	10.70	10.85
CO	2.35	0.00	2.35
total HAPs	0.00	0.50	0.50
worst case single HAP	0.00	0.25	0.25
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Printing Press	TOTAL
PM	0.05	0.00	0.05
PM10	0.21	0.00	0.21
SO2	0.02	0.00	0.02
NOx	2.80	0.00	2.80
VOC	0.15	10.70	10.85
CO	2.35	0.00	2.35
total HAPs	0.00	0.50	0.50
worst case single HAP	0.00	0.25	0.25
Total emissions based on rated capacity at 8,760 hours/year, after control.			

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
CP: 039-11783
Plt ID: 039-00269
Reviewer: Nishat Hydari / EVP

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Harris N-1650	1600	54	544942

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Black Ink, NHNP Low Rub (Oil)	0.854	12.8%	5.00%	544942	1.49
Color Ink (Soy) (Worse Case, Yellow)	0.18	7.5%	5.00%	544942	0.18
Blanket Wash Y-911	0.031	96.0%	100.00%	544942	8.11
Blanket Wash Y-995	0.003	30.0%	100.00%	544942	0.25
Bleach Sanitizer	0.001	0.0%	100.00%	544942	0.00
Mobile Mist Lube 27	0	0.0%	100.00%	544942	0.00
Dead Unit Compound	0	0.0%	100.00%	544942	0.00
Reprofix 800L Fixer Part A	0.047	0.0%	100.00%	544942	0.00
Repofix 800L Fixer, Part B Hardener	0.001	0.0%	100.00%	544942	0.00
Subtractive Developer SD 100	0.023	10.8%	100.00%	544942	0.68
Subtractive Finisher SF100	0	0.0%	100.00%	544942	0.00
AFGA G101P Developer Part A	0	0.0%	100.00%	544942	0.00
AFGA G101P Developer Part B	0	0.0%	0.00%	544942	0.00
RE-Con Plate Cleaner	0	90.0%	100.00%	544942	0.00

Total VOC Emissions =	10.70 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
CP: 039-11783
Plt ID: 039-00269
Reviewer: Nishat Hydari / EVP

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Harris N-1650	1600	54	544942

INK VOCS					
Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Black Ink, NHNP Low Rub (Oil)	0.854	12.8%	5.00%	544942	1.49
Color Ink (Soy) (Worse Case, Yellow)	0.18	7.5%	5.00%	544942	0.18
Blanket Wash Y-911	0.031	96.0%	100.00%	544942	8.11
Blanket Wash Y-995	0.003	30.0%	100.00%	544942	0.25
Bleach Sanitizer	0.001	0.0%	100.00%	544942	0.00
Mobile Mist Lube 27	0	0.0%	100.00%	544942	0.00
Dead Unit Compound	0	0.0%	100.00%	544942	0.00
Reprofix 800L Fixer Part A	0.047	0.0%	100.00%	544942	0.00
Repofix 800L Fixer, Part B Hardener	0.001	0.0%	100.00%	544942	0.00
Subtractive Developer SD 100	0.023	10.8%	100.00%	544942	0.68
Subtractive Finisher SF100	0	0.0%	100.00%	544942	0.00
AFGA G101P Developer Part A	0	0.0%	100.00%	544942	0.00
AFGA G101P Developer Part B	0	0.0%	0.00%	544942	0.00
RE-Con Plate Cleaner	0	90.0%	100.00%	544942	0.00

Total VOC Emissions =	10.70 Ton/yr
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*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart, IN 46516
CP#: 039-11783
Plt ID: 039-00269
Permit Reviewer: Nishat Hydari / EVP

Material	Density (Lb/Gal)	Pounds of Material (lbs/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Cumene	Weight % Napthalene	Weight % Hydroquinone	Weight % Glycol Ether	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Hydroquinone Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Blanket Wash Y-911	7.01	0.031000	37.23	5.00%	4.00%	0.00%	0.00%	0.00%	0.25	0.20	0.00	0.00	0.00
Blanket Wash Y-995	6.34	0.003000	37.23	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.05	0.00	0.00
AFGA G101P Developer Part B	1	0.000000	37.23	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.00	0.00
RE-Con Plate Cleaner	8.62	0.000000	37.23	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions	0.25	0.20	0.05	0.00	0.00
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METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Elkhart Truth Publishing Company
Address City IN Zip: 421 South Second Street, Elkhart IN 46516
CP: 039-11783
Plt ID: 039-00269
Reviewer: Nishat Hydari / EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.4

56.1

Facilities	MMBtu/hr
Boiler (B1)	4.6
Boilers (B2)	0.9
Boiler (B3)	0.9
Total	6.4

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
	**see below					
Potential Emission in tons/yr	0.05	0.21	0.02	2.80	0.15	2.35

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).